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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

3:11-cr-00028-BR-1

Plaintiff,

**MOTION TO CONTINUE
EVIDENTIARY HEARING DATE**

v.

RICHARD ROOSEVELT BAHR JR.,

Defendant.

Defendant Richard Roosevelt Bahr Jr., through his attorney, Thomas J. Hester, moves this Court to continue the evidentiary hearing in the above-entitled case, which is presently scheduled for April 10, 2014, for a period of approximately 40 days. This motion is made based on the need for defense investigation in advance of such a hearing.

After conferring with the Government and the Court, it appears that the morning of May 20, 2014, or the morning of June 11, or anytime on June 12 or June 13, 2014, would accommodate the parties schedules. At this juncture, I request that the Court allow four hours for this hearing.

No prior continuances of the evidentiary hearing have been sought by the defense. Assistant United States Attorney Gary Sussman does not oppose the requested continuance.

Respectfully submitted this 9th day of April, 2014.

/s/ Thomas J. Hester

Thomas J. Hester
Attorney for Defendant